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23443 S. Hays Road  
Manteca, CA 95337  
October 2, 1998

Lester Snow and BDAC Members  
CALFED Bay-Delta Program  
1416 9th St., Suite 1155  
Sacramento, CA 95814

Dear Lester Snow and BDAC Members:

In response to Lester's September 30 letter, the extent to which BDAC can contribute to developing, selecting, supporting, and carrying out a preferred alternative will depend on how we function. It will depend in large measure on the adequacy and unbiased nature of information submitted to BDAC by the staff, and on the willingness of both the staff and the members of BDAC to objectively discuss major areas of concern.

There are many issues to be resolved, but the issue of whether agriculture, urbans, and the environment will "get better together" is a major issue. Whether getting better together is possible will depend in substantial part on whether the plan commits to measures that will to a substantial degree close the gap that will otherwise exist between the long term water supply and the legitimate needs of each of the three categories when the population has increased as anticipated during the 30 year time frame of the plan. To the extent that the gap is not closed, all three categories may have to share a shortage. However, if the shortage is substantial it is likely that it will initially be imposed primarily on agriculture, and that it will later be imposed primarily on the environment when the public finds that the agricultural shortage significantly affects the price and availability of food. It will then be too late to reverse the process.

The staff has a monumental job and many able people, but it has not provided the BDAC with the adequate, unbiased information that is needed for informed debate on crucial issues. BDAC is not often privy to meaningful discussions of uncertainty and risk and the distribution of impacts.

1) At the last BDAC meeting Sunne McPeak provided an oral discussion of the probable gap between supply and demand with reasonable estimates of possible water savings. The staff has often been asked to do this for us and has not done so. Without it we can not hope to resolve this issue.

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2) The staff is reportedly making major changes in its through-Delta proposal, but it has not informed the BDAC on what it is doing. The staff has not only refused to analyze a proposal which I made for an improved through Delta-conveyance, but has ~~has~~ issued a misleading report on the subject. (See my September 26 response to an inquiry by Senator Johannessen).

3) CALFED has agreed at times that the selection of a preferred alternative should only be made after examination of the adequacy of possible assurances. It has neither said how an isolated canal would be operated to protect the Delta nor how any operating plan could be legally assured.

4) Adaptive management means trying various measures and then deciding, after analysis of results, how to modify those measures or whether to try different measures that may give better results. It is not adaptive management when we prejudge that if a measure is not fully satisfactory some other measure will be the answer. There should be no "triggers". For example, we do not know whether the dominant cause of unsatisfactory recovery of a species of fish will be because of exotic species, upstream problems, or something not yet recognized. We, therefore, do not know that fishery concerns preclude a through-Delta design that provides adequate export water quality.

5) CALFED assumes that the need for increased water supply may be avoided or greatly diminished by reallocation of water from agriculture. We have repeatedly urged that there be an assessment of the extent to which this is realistically feasible. The analysis should assume that transfers are really intended to abide by the "no-injury" rule, and that the seller is not selling water that is already being beneficially used either by parties other than the seller or for public trust purposes in the central valley or for existing exports. CALFED acknowledges that transfers do not create water but still talks as if they do.

6) CALFED has not addressed the fact that groundwater overdraft is not sustainable and must not be condoned as part of a 30 year plan.

7) CALFED has refused to include viable measures for restoring a salt balance south of the Delta. Continuation of this enormous accumulation of imported salt in the soils and groundwaters of the San Joaquin valley must not be part of a 30 year plan that was promised to make us all "get better together". CALFED should not condone any plan which does not protect our groundwaters and soils for future generations.

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I believe that all of these contentious issues must be resolved before CALFED can gain the support it needs to go forward. We can not merely postpone or gloss over these issues.

What success we have next year will depend on whether we are working with a viable "preferred alternative".

Sincerely,



Alex Hildebrand